

**BEFORE THE FLORIDA
JUDICIAL QUALIFICATIONS COMMISSION**

**INQUIRY CONCERNING A
JUDGE, NO. 01-244**

CASE NO.: SC01-2670

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RESPONDENT'S PREHEARING STATEMENT

Pursuant to the Order Scheduling Hearing and Prehearing Conference, the Respondent provides this prehearing statement:¹

WITNESSES TO BE CALLED BY RESPONDENT

1. Judge Charles W. Cope – All areas of formal charges.
2. Dr. Lisa V. Jeanes – Encounters with Judge Cope in Carmel, California on April 3-5, 2001.
3. Dr. Nina V. Jeanes – Encounters with Judge Cope in Carmel, California on April 3-5, 2001.
4. Officer Philip Nash – Encounter with Judge Cope in Carmel, California in early morning of April 4, 2001, and detention, interrogation and arrest of Judge Cope the following morning. Statements of Lisa and Nina Jeanes concerning events in California.
5. Corporal John Nyunt – Detention, interrogation and arrest of Judge Cope the morning of April 5, 2001.

¹ Discovery is ongoing. Respondent reserves the right to seek to add additional witnesses and exhibits, as more information is discovered.

6. Judge John F. Steinheider – Witnessed Lisa Jeanes and Nina Jeanes exit Charles Cope's hotel room. Prior thereto heard extended loud, vulgar and abusive argument between the two women.

7. Judge Susan Schaeffer – Judge Cope's disclosures.

EXHIBITS TO BE OFFERED BY RESPONDENT

- 8. Exhibits 1 through 10 listed by Special Counsel for JQC
- 9. All records obtained during discovery from Normandy Inn
- 10. Photographs of La Playa Hotel
- 11. Photographs of beach area
- 12. Photograph of key
- 13. Photograph of door
- 14. Deposition exhibits

Respectfully submitted,

ROBERT W. MERKLE, ESQ.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via facsimile and U.S. Mail to: **Judge James R. Jorgenson**, Chair of the Judicial Qualifications Commission Hearing Panel, 3rd District Court of Appeal, 2001 S.W. 117th Avenue, Miami, Florida 33175-1716; **John Beranek, Esq.**, Counsel to the Hearing Panel of the Judicial Qualifications Commission, P.O. Box 391, Tallahassee, Florida 32302; **John S. Mills, Esq.**, Special Counsel, Foley & Laudner, 200 Laura Street, Jacksonville, Florida 32201-0240; **Brooke S. Kennerly**, Executive Director of the Florida Judicial Qualifications Commission, 1110 Thomasville Road, Tallahassee, Florida 32303; **Thomas C. MacDonald, Jr., Esq.**, General Counsel to the Investigative Panel of the Judicial Qualifications Commission, 100 North Tampa Street, Suite 2100, Tampa, Florida 33602, **Louis Kwall, Esq.**, Co-Counsel for Respondent, 133 North Ft. Harrison Avenue, Clearwater, Florida 33755; this 13th day of March, 2002.

ROBERT W. MERKLE, ESQ.